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Attorney for Plaintiff Gerasimos Molfetas

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES ANTITRUST LITIGATION

Civil Action No. 4:13-md-02420-YGR

MDL No. 2420

**STATEMENT IN SUPPORT OF
APPOINTMENT OF COTCHETT,
PITRE & McCARTHY, LLP AND
LIEFF CABRASER HEIMANN &
BERNSTEIN AS CO-LEAD
COUNSEL FOR INDIRECT
PURCHASERS**

This Document Relates to:

Indirect Purchaser Plaintiffs

Date: April 3, 2013

Time: 2:00 p.m.

Judge: Hon. Yvonne Gonzalez Rogers
Ctrm: 5, 2nd Floor

**STATEMENT IN SUPPORT OF APPOINTMENT OF COTCHETT, PITRE & McCARTHY, LLP
AND LIEFF CABRASER HEIMANN & BERNSTEIN AS CO-LEAD COUNSEL FOR INDIRECT
PURCHASERS, Case No. 13-md-24240-YGR**

1 Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure and this Court's order of
 2 March 4, 2013 (Dkt. No. 8), Plaintiff Gerasimos Molfetas and his counsel Pomerantz Grossman
 3 Hufford Dahlstrom & Gross LLP support the Motion for an Order Appointing Cotchett, Pitre &
 4 McCarthy, LLP ("CPM") and Lieff Cabraser Heimann & Bernstein, LLP ("Lieff") as co-lead and
 5 trial counsel for the putative indirect purchaser class.

6 We believe that the leadership of CPM and Lieff would greatly benefit the class. We have
 7 previously worked with both firms, and are aware of and respect CPM and Lieff's prior
 8 experience in this type of litigation, and believe their many years of extensive antitrust and
 9 complex litigation experience make them the most appropriate choice to serve as interim co-lead
 10 counsel on behalf of the proposed class. Most important, both CPM and Lieff have a proven
 11 ability to lead and *try* complex cases successfully.

12 The attorneys of Pomerantz Grossman Hufford Dahlstrom & Gross LLP have over a
 13 hundred years of experience in complex civil litigation. We believe that we could work
 14 effectively with CPM and Lieff in this case.

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 16 DATED: March 28, 2013

**Pomerantz Grossman
 Hufford Dahlstrom & Gross LLP**

17 /s/ Jayne A. Goldstein

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 28 *Attorney for Plaintiff Gerasimos Molfetas*

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filings to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM-ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 28, 2013.

/s/ *Jayne Arnold Goldstein*
Jayne A. Goldstein